

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

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|---|---|------------------------------|
| GAILEN LEE DAVID, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Civil Action No. |
| v. |) | 1:22-cv-00287-RDA-IDD |
| |) | |
| En Pointe Productions LLC, <i>et al.</i> |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |
| |) | |
| |) | |

**JOINT MOTION FOR AN ORDER TO TRANSFER \$50,000
IN DEFENSE COUNSEL’S TRUST ACCOUNT HELD ABEYANCE**

COME NOW, Defendants En Pointe Productions LLC (“EPP”), On It Media LLC (“OIM”), Robert Laurie, April Carter, Nicole Noya, More News Later Media LLC (“MNL”), Gorgon LLC (“Gorgon”), Deviant Entertainment LLC (“Deviant”), and Nikki Nutrition LLC (“NN”) (collectively “Jet Set Defendants”) and Plaintiff Gailen Lee David, by and through the undersigned counsel, and respectfully request the Court to order that \$50,000 currently maintained in defense counsel’s trust account be distributed as described below, and state as follows in support thereof:

1. On September 14, 2023, this Court entered an order requiring that counsel for the Jet Set Defendants hold in abeyance \$50,000 maintained in the attorney trust account of counsel for Jet Set Defendants pending the outcome of the Court’s decision on motions for attorney’s

fees. (*Docket No. 152*).

2. Counsel has held these funds pursuant to the Court's order.

3. Jet Set Defendants and Plaintiff have settled all pending matters among and between them.

4. Jet Set Defendants and Plaintiff respectfully request that the Court enter and order directing counsel for Jet Set Defendants to disburse the funds held in abeyance as follows:

- a. \$40,000 payable to *The Pels Law Firm, LLC*; and
- b. \$10,000 payable to the attorney trust account for Charise Hines Law.

5. Jet Set Defendants also file herewith a Notice of Settlement and request that their Motion for Attorneys' Fees be withdrawn.

6. Plaintiff Gailen Lee David joins in this motion.

WHEREFORE, Jet Set Defendants and Plaintiff respectfully request that the Court grant their Motion and enter an order directing counsel for Jet Set Defendants to disburse the funds held in abeyance as noted above.

Dated: November 30, 2023

Respectfully submitted,

THE PELS LAW FIRM

/s/ Jon D. Pels

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| <i>Laurie, April Carter, Nicole Noya, More</i> | |
| <i>News Later Media LLC, Gorgon LLC,</i> | |
| <i>Deviant Entertainment LLC, and Nikki</i> | |
| <i>Nutrition LLC</i> | |

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2023, I caused a true and correct copy of the foregoing to be filed via the Court's ECF filing system which will send a notification of such filing to all counsel of record, as well as emailing copies of sealed documents, as follows:

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